

FILED

June 4, 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

KAREN MITCHELL
CLERK, U.S. DISTRICT
COURT

UNITED STATES OF AMERICA

v.

NO. 3:24-mj-509-BT

BHUSHAN ATHALE

MOTION FOR DETENTION AND CONTINUANCE

The United States moves for pretrial detention of defendant, **Bhushan Athale**, pursuant to 18 U.S.C. §3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves (check all that apply):

 X Crime of violence (18 U.S.C. § 3156)

 Maximum sentence life imprisonment or death

 10 + year drug offense

 Felony, with two prior convictions in above categories

 X Serious risk defendant will flee

 Serious risk obstruction of justice

 Felony involving a minor victim

 Felony involving a firearm, destructive device, or any other
dangerous weapon

 Felony involving a failure to register (18 U.S.C. § 2250)

2. Reason for Detention. The Court should detain defendant because there are no conditions of release which will reasonably assure:

 X Defendant's appearance as required

 X Safety of any other person and the community

3. Rebuttable Presumption. The United States will/will not invoke the rebuttable presumption against defendant because:

 Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

 Probable cause to believe defendant committed a federal crime of terrorism, 18 U.S.C. § 2332b(g)(5)

 Probable cause to believe defendant committed an offense involving a minor, 18 U.S.C. §§ 1201, 2251

 Previous conviction for "eligible" offense committed while on pretrial bond

4. Time For Detention Hearing. The United States requests the Court conduct the detention hearing,

 At first appearance

 X After continuance of 2 days (not more than 3).

DATED this the 4th day of June, 2024.

Respectfully submitted,

LEIGHA SIMONTON
UNITED STATES ATTORNEY

/s/ Renee M. Hunter

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing will be served on counsel for the defendant at the defendant's initial appearance in accordance with the Federal Rules of Criminal Procedure.

/s/ Renee M. Hunter

Renee M. Hunter
Assistant United States Attorney